

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ABBOTT LABORATORIES, ET
AL., PRETERM INFANT NUTRITION
PRODUCTS LIABILITY LITIGATION

MDL No. 3026

Master Docket No. 1:22-CV-00071

Judge Rebecca R. Pallmeyer

This Document Relates to:

Mar v. Abbott Laboratories, Case No. 1:2022-cv-
00232

**Declaration of Timothy J. Becker in Support of Plaintiff's Response to Abbott's Motion to
Clarify the Process for Presentation of Evidence that Might Implicate It's First Amendment
Rights**

I, Timothy J. Becker, state and declare as follows:

1. I am a partner with the law firm of Johnson Becker, PLLC, and counsel for Plaintiffs in this MDL. I am duly authorized to practice before this Court. I have personal knowledge of the facts and assertions set forth herein. I gained that information in connection with my role as Co-Lead Counsel and as a member of the Plaintiffs' Leadership Committee. If called to testify I could report on the veracity of the facts and documents set forth herein.

2. Attached hereto are true and accurate copies of the following document(s) submitted in support of Plaintiff's Response to Abbott's Motion to Clarify the Process for Presentation of Evidence that Might Implicate It's First Amendment Rights:

- Attached as **Exhibit A** is a true and accurate copy of a document bates-labeled FOIA_00000033, including various email chains from Dr. Charlene A. Wong.

Dated: April 30, 2025

Respectfully submitted,

/s/ Timothy J. Becker